

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HEATHER KIERNAN

Plaintiff,

-v-

ARMORED MOTOR SERVICE OF
AMERICA, INC., ET AL.

Defendant.

CIVIL NO. 04-10131 RBC

**JOINT STATEMENT OF THE PARTIES
PURSUANT TO LOCAL RULE 16.1(D)**

Pursuant to Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, the parties in the above-captioned matter submit the following Joint Statement.

- I. **The parties propose that the agenda at the scheduling conference include the following proposed schedule:**
 - a. Voluntary Disclosures (Rule 26(a)(1)): On or before October 6, 2004;
 - b. Deadline to Amend Pleadings: May 1, 2005;
 - c. All written discovery served by (including request for admissions): July 1, 2005;
 - d. Discovery Completed by (including depositions, written discovery, and motions thereunder): August 31, 2005;
 - e. Rule 26(a)(2)(B) Expert Disclosure by Plaintiff: June 15, 2005
 - f. Rule 26(a)(2)(B) Expert Disclosure by Defendants: July 15, 2005
 - g. Expert Depositions, if any, completed: August 31, 2005.
 - h. Dispositive Motions Filed: October 7, 2005;

- i. Pretrial Date: On or about December 2005.

II. Other Matters

- a. The parties have conferred and will consent to a trial by a magistrate judge.
- b. A written settlement proposal has been presented by Plaintiff to Defendants, and defense counsel will be prepared to respond to the proposal at the Scheduling Conference.
- c. Certifications required under Local Rule 16(D)(3) were previously filed with the Court, with copies being sent to the parties.

Respectfully submitted,

HEATHER KIERNAN

ARMORED MOTOR SERVICE OF
AMERICA, INC.

By her Attorney,

By its Attorneys,



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Dated: September 22, 2004